

**REMARKS**

This is a full and timely response to the outstanding non-final Office Action mailed May 5, 2005. Reconsideration and allowance of the application and presently pending claims, as amended, are respectfully requested.

1. Response to Rejection of Claims 1-20 Under 35 U.S.C. § 102(e)

Claims 1-20 have been rejected under 35 U.S.C. § 102(e) as being anticipated by *Zhou* (WO 02/31814). Applicants respectfully traverse this rejection.

It is axiomatic that “[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration.” *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(e).

In the present case, not every feature of the claimed invention is represented in the *Zhou* reference. Applicants discuss the *Zhou* reference and Applicants’ claims in the following.

a. Claim 1

As provided in independent claim 1, Applicants claim:

A method for conducting a search for stored information,  
comprising the steps of:  
presenting a user interface to a user;  
***receiving an identification of a particular search language in  
which to search from the user;***  
receiving a search query; and  
***conducting a search of a database that contains information  
written in the identified language.***

(Emphasis added).

Applicants respectfully submit that independent claim 1 is allowable for at least the reason that *Zhou* does not disclose, teach, or suggest at least the features of “receiving an identification of a particular search language in which to search from the user” and “conducting a search of a database that contains information written in the identified language,” as recited and emphasized above.

Rather, *Zhou* discloses at most an "apparatus for a language independent, voice-based Internet or Intranet search system." Page 2, lines 21-22. For example, *Zhou* "automatically identif[ies] the language spoken by the user." Page 2, lines 25-29. As taught by *Zhou*, "[a]utomatic language identification allows users speaking different languages to search the Internet or an intranet using a single system via their own voice without especially telling the system what language they are speaking." Page 3, lines 24-26 (Emphasis added). Therefore, *Zhou* fails to teach or suggest "receiving an identification of a particular search language in which to search from the user," as recited in claim 1. For at least this reason, *Zhou* fails to anticipate claim 1.

Further, *Zhou* discloses that "keywords may be automatically input as search terms in different languages 30 to a search engine 32," where the "search engine searches the Internet or a specified intranet and returns the search results in different languages 34 to the language independent user interface 24." Page 7, lines 15-20 (Emphasis added). Therefore, *Zhou* fails to teach or suggest "conducting a search of a database that contains information written in the identified language," since *Zhou* teaches the searching of databases that are not of an identified language. For at least this reason, *Zhou* fails to anticipate claim 1.

Therefore, the rejections of claim 1 should be withdrawn for at least the aforementioned reasons.

b. Claims 2-9

Because independent claim 1 is allowable over the cited art of record, dependent claims 2-9 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that the dependent claims 2-9 contain all the steps and features of independent claim 1. For at least this reason, the rejection of claims 2-9 should be withdrawn.

Additionally and notwithstanding the foregoing reasons for allowability of claims 2-9, these claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

Accordingly, the rejections to these claims should be withdrawn.

c. Claim 10

As provided in independent claim 10, Applicants claim:

A universal search engine, comprising:  
means for interfacing with a user; and  
*means for searching one of several different available  
language databases in one of several different available search  
languages identified by the user.*

(Emphasis added).

Applicants respectfully submit that independent claim 10 is allowable for at least the reason that *Zhou* does not disclose, teach, or suggest at least "means for searching one of several different available language databases in one of several different available search languages identified by the user," as recited and emphasized above.

Rather, *Zhou* discloses at most an "apparatus for a language independent, voice-based Internet or Intranet search system." Page 2, lines 21-22. For example, *Zhou* "automatically identif[ies] the language spoken by the user." Page 2, lines 25-29. As taught by *Zhou*, "[a]utomatic language identification allows users speaking different languages to search the Internet or an intranet using a single system via their own voice without especially telling the system what language they are speaking." Page 3, lines 24-26 (Emphasis added). Further, *Zhou* discloses that "keywords may be automatically input as search terms in different languages 30 to a search engine 32," where the "search engine searches the Internet or a specified intranet and returns the search results in different languages 34 to the language independent user interface 24." Page 7, lines 15-20 (Emphasis added). Therefore, *Zhou* fails to teach or suggest "means for searching one of several different available language databases in one of several different available search languages identified by the user," as recited in claim 10. For at least this reason, *Zhou* fails to anticipate claim 10.

Therefore, the rejections of claim 10 should be withdrawn for at least the aforementioned reasons.

d. Claims 11-15

Because independent claim 10 is allowable over the cited art of record, dependent claims 11-15 (which depend from independent claim 10) are allowable as a

matter of law for at least the reason that the dependent claims 11-15 contain all the elements and features of independent claim 10. For at least this reason, the rejection of claims 11-15 should be withdrawn.

Additionally and notwithstanding the foregoing reasons for allowability of claims 11-15, these claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

e. Claim 16

As provided in independent claim 16, Applicants claim:

Search engine software stored on a computer readable medium,  
comprising:

logic configured to present a user interface to a user;

***logic configured to receive an identification of a particular  
search language from the user;***

logic configured to receive a search query with the user  
interface; and

***logic configured to search a database that contains  
information in the identified language.***

(Emphasis added).

Applicants respectfully submit that independent claim 16 is allowable for at least the reason that *Zhou* does not disclose, teach, or suggest at least the features of "logic configured to receive an identification of a particular search language from the user" and "logic configured to search of a database that contains information in the identified language," as recited and emphasized above.

Rather, *Zhou* discloses at most an "apparatus for a language independent, voice-based Internet or Intranet search system." Page 2, lines 21-22. For example, *Zhou* "automatically identif[ies] the language spoken by the user." Page 2, lines 25-29. As taught by *Zhou*, "[a]utomatic language identification allows users speaking different languages to search the Internet or an intranet using a single system via their own voice without especially telling the system what language they are speaking." Page 3, lines 24-26 (Emphasis added). Therefore, *Zhou* fails to teach or suggest "logic

configured to receive an identification of a particular search language from the user," as recited in claim 16. For at least this reason, *Zhou* fails to anticipate claim 16.

Further, *Zhou* discloses that "keywords may be automatically input as search terms in different languages 30 to a search engine 32," where the "search engine searches the Internet or a specified intranet and returns the search results in different languages 34 to the language independent user interface 24." Page 7, lines 15-20 (Emphasis added). Therefore, *Zhou* fails to teach or suggest "logic configured to conduct a search of a database that contains information in the identified language," since *Zhou* teaches the searching of databases that are not of an identified language. For at least this reason, *Zhou* fails to anticipate claim 16.

Therefore, the rejections of claim 16 should be withdrawn for at least the aforementioned reasons.

f. Claims 17-20

Because independent claim 16 is allowable over the cited art of record, dependent claims 17-20 (which depend from independent claim 16) are allowable as a matter of law for at least the reason that the dependent claims 17-20 contain all the features of independent claim 16. For at least this reason, the rejection of claims 17-20 should be withdrawn.


Additionally and notwithstanding the foregoing reasons for allowability of claims 17-20, these claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

Accordingly, the rejections to these claims should be withdrawn.

***CONCLUSION***

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,

  
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